

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	Criminal No. 14-158
v.	)	
	)	
ZUNED SUNESRA	)	

**GOVERNMENT’S POSITION WITH RESPECT TO SENTENCING FACTORS**

AND NOW comes the United States of America, by its attorneys, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Conor Lamb and Jonathan Ortiz, Assistant United States Attorneys for said District, and respectfully files the following Position with Respect to Sentencing Factors:

1. The Government has reviewed the final Presentence Investigation Report (“PIR”), and has no objections. In particular, the three-point enhancement for the defendant’s leadership role is warranted considering that, by his own admission, “[b]eginning in 2003 and until his arrest in the instant case, the defendant co-owned and operated Asian Capital Equities,” PIR at 14, ¶ 54, which was the parent company for the Emedoutlet.com Network. *See id.* at 8, ¶ 11.

2. The stipulated sentence of 30 months, though slightly below the Guidelines range, is appropriate based upon the totality of the circumstances in this case.

Respectfully submitted,

DAVID J. HICKTON  
United States Attorney

s/ Conor Lamb  
CONOR LAMB  
Assistant U.S. Attorney  
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